



April 18, 2025

**Via Email**

The Honorable Joel H. Slomsky  
United States District Court  
5614 James A. Byrne United States Courthouse  
601 Market Street  
Philadelphia, PA 19106

**RE: April Ploeger v. The Trustees of the University of  
Pennsylvania, E.D. Pa., No. 2:22-cv-02389-JHS**

Dear Judge Slomsky:

Following the Court's telephone conference on April 17, 2025, and with Plaintiff's counsel copied on this correspondence, I am writing to clarify Penn's position regarding Susan Shapiro. Ms. Shapiro is a former employee of Penn and is no longer under its control. I will reach out to my client to obtain her last known address and will provide that information to Plaintiff's counsel. At this time, we do not know whether she resides within the Court's subpoena power, but we will keep both Plaintiff's counsel and the Court informed as we learn more.

Regarding Plaintiff's interest in deposing Ms. Shapiro—an issue not raised in Plaintiff's Motion to Compel—we respectfully renew our request that the Court impose appropriate limitations on the scope and duration of that deposition. Specifically, we ask that the deposition be limited to the narrow subject matter referenced in the deposition transcript attached to Plaintiff's Motion to Compel (Doc. Nos. 42, 43), namely the emails dated February 9 and 10, 2016. We have enclosed those emails for the Court's convenience (Bates-stamped D\_617–619). Given the focused nature of this inquiry with Ms. Shapiro, we also request that the deposition be limited to one hour.

We appreciate the Court's attention to this matter and remain available should the Court have any further questions or require additional information.

Respectfully yours,

A handwritten signature in cursive script that reads "Leslie Miller Greenspan".

Leslie Miller Greenspan

cc: Mart Harris, Esquire (via email)